Case 2:25-mj-30430-DUTY ECF No. 1 PageID 1 Filed 07/07/25 Page 1 of 5 Telephone: (313) 226-9100

Task Force Officer: Kylie Churches Telephone: (313) 202-3400 AO 91 (Rev. 11/11) Criminal Complaint

# UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

Case: 2:25-mj-30430 United States of America Assigned To: Unassigned Assign. Date: 7/7/2025

Frederick Dye Description: RE: FREDERICK DYE Case No.

(EOB

		CI	RIMINAL COMF	PLAINT		
I, the co	emplainant in this ca	ase, state that	the following is tru	e to the best of my knowled	ge and belief.	
On or about the date(s) of			July 4, 2025	in the county of	Wayne	in the
Eastern	District of	Michigan	, the defendar	nt(s) violated:		
Code Section			Offense Description			
8 U.S.C. 922(g)(1)			Felon in possession of a firearm			
This cri	minal complaint is	based on these	e facts:			
See attached affid	-		- 10000			
✓ Continued of	on the attached shee	et.		Wyli Chan		
				Complainant's s	signature	
				Kylie Churches, Tas	sk Force Officer	
Sworn to before me and signed in my presence				Printed name of	and title	
Sworn to before me and/or by reliable e		ence		David G. M		
Date: <u>July 7, 2025</u>				Judge's sign	nature	
City and state: <u>De</u>	troit, MI			Hon. David R. Grand, U.S.		
				Printed name of	and title	

## **AFFIDAVIT**

I, Kylie Churches, being duly sworn, depose and state the following:

## I. INTRODUCTION

- 1. I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosive (ATF). I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code, Section 2510(7), and I am empowered by law to conduct investigations and make arrests of offenses enumerated under Federal law.
- 2. I have been a Task Force Officer (TFO) with ATF since March 2022, and I have had extensive law enforcement training, including at the Detroit Police Department Training Center. In addition to being a TFO with the ATF, I have been employed as a police officer with the City of Detroit for approximately six years. I also have a bachelor's degree in criminal justice.
- 3. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement officers, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement officers, and information gained by my training and experience. This affidavit does not include all the information known to law enforcement related to this investigation.
- 4. ATF is currently investigating Frederick DYE for being a felon in possession of a firearm and ammunition, in violation of 18 U.S.C. § 922 (g)(1).

#### II. PROBABLE CAUSE

- 5. On July 4, 2025, at approximately 9:50 p.m., Detroit Police officers on patrol in the area of Prairie Street and Alaska Street in Detroit, Michigan observed a group of people in possession of what the officers suspected to be open intoxicants on a public sidewalk. The officers stopped their vehicle to investigate.
- 6. As the officers approached the group, an individual—later identified as Frederick DYE—distanced himself from the group and walked towards a residence. The officers watched DYE bend forward, reach into his waistband, and make a throwing motion towards the front porch of the residence. The officers heard a loud thud.
- 7. One officer temporarily detained DYE. A second officer walked to the front porch where DYE made the throwing motion and recovered a black Beretta, .380 caliber handgun. Officers placed DYE under arrest. Unprompted, DYE told the officers that he was carrying "Fred's gun."
- 8. On July 7, 2025, I consulted with Special Agent (SA) Kara Klupacs, an interstate nexus expert. SA Klupacs stated that the Beretta, .380 caliber handgun, based on the written description provided, without physically examining it, is a firearm as defined by federal law and was manufactured outside the state of Michigan and therefore traveled in and affected interstate commerce.

- 9. I reviewed records related to DYE's criminal history and learned the following:
  - a. On or about August 4, 2005, DYE pleaded guilty to one count of felony Controlled Substance—Sell, Distribute, or Dispense in the United States District Court for the Eastern District of Michigan (case number 04-cr-80593). On September 28, 2006, DYE was sentenced to 84 months' incarceration with the Bureau of Prisons, followed by a term of supervised release.
- 10. Based on my training and experience, defendants are warned of the maximum penalty when they enter a plea of guilty to a felony. Additionally, defendants are advised that they are pleading guilty to a felony. Based on the time DYE spent incarcerated or under supervision as a result of his felony conviction, and the severity of his conviction, there is probable cause to believe that DYE is aware of his status as a convicted felon.

## III. CONCLUSION

11. Based upon the aforementioned facts stated herein, there is probable cause to believe DYE, a convicted felon aware of his felony convictions, did knowingly and intentionally possess a black Beretta, .380 caliber handgun, said firearm having affected interstate commerce, in violation of 18 U.S.C. § 922(g)(1). This violation occurred on or about July 4, 2025, in Detroit, Michigan, in the Eastern District of Michigan.

Respectfully submitted,

Kyli Chri

Task Force Officer Kylie Churches Bureau of Alcohol, Tobacco, Firearms and Explosives.

Sworn to before me and signed in my presence and/or by reliable electronic means.

Honorable David R. Grand

United States Magistrate Judge

Dated: July 7, 2025